## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF RHODE ISLAND

KAREN PETRO, as Administratrix of the Estate of Mark Jackson

٧.

C.A. No. 2009-213S

TOWN OF WEST WARWICK, by and through its Finance Director Malcolm A. Moore; PATRICK J. KELLEY, individually and in his representative capacity; SEAN LUKOWICZ, individually and in his representative capacity; and SCOTT THORNTON, individually and in his representative capacity

## **REVISED AFFIDAVIT**

Stephen P. Sheehan, being duly sworn, hereby deposes and says:

- 1) I am counsel for Plaintiff in the captioned matter and submit this Revised Affidavit in connection with Plaintiff's Motion *in Limine* for an order excluding the testimony of Defendants' experts Deborah Mash, Charles Wetli and Gary Dias. The revision is that Plaintiff is hereby submitting Unsworn Declarations with her expert reports.
- 2) While not wishing to unduly burden the Court, Plaintiff is obliged to submit herewith the expert reports (and the experts' Curriculum Vitae) that set forth the opinions of Deborah Mash and Charles Wetli or support Plaintiff's challenge thereto.

  These documents are appended as follows:

| Tab A) | Unsworn Declaration and Report of Peter Gillespie dated |
|--------|---|
| •      | June 15, 2010;  |

- Tab B) Curriculum Vitae for Peter Gillespie, M.D.;
- Tab C) Unsworn Declaration and Rebuttal report of Peter Gillespie dated September 7, 2010;

| Tab D) | Unsworn Declaration and Report of Kevin Brown dated May 21, 2010;               |
|--------|---|
| Tab E) | Curriculum Vitae of Kevin Brown;  |
| Tab F) | Unsworn Declaration and Rebuttal report of Kevin Brown dated September 3, 2010; |
| Tab G) | Unsworn Declaration and Report of Debra Pinals, M.D. dated September 7, 2010;   |
| Tab H) | Curriculum Vitae of Debra Pinals, M.D.;   |
| Tab I) | Report of Deborah Mash, Ph.D dated June 28, 2010 submitted by Defendants;       |
| Tab J) | Curriculum Vitae of Deborah Mash submitted by Defendants;                       |
| Tab K) | Report of Charles Wetli, M.D. dated June 25, 2010 submitted by Defendants; and, |
| Tab L) | Report of Gary Dias dated September 9, 2010.  Stephen P. Sheehan                |

SUBSCRIBED AND SWORN to before me this

\_day of February, 2011.

Notary Public

My Commission Expires: 6/11/13

## **CERTIFICATION**

I hereby certify that I caused to be served by electronic means (ECF) a copy of the within on the  $8^{th}$  day of February, 2011, to the following:

Marc DeSisto, Esq. marc@desistolaw.com

/s/Daria L. Souza